

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF KENTUCKY  
AT LOUISVILLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BEN HARDY, et al.,

Defendants.

Civil Action Nos. 90-0695-L(J)  
90-0792-L(A)

DECLARATION OF HELEN ROGERS

I, Helen Rogers, declare and state as follows:

1. Unless otherwise indicated, I have personal knowledge of the facts set forth herein and would be competent to testify thereto.

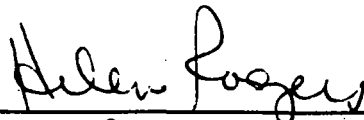
2. I was started working for Mr. Hofgesang in approximately 1970. I worked at the Crittenden Drive office, which was not near the landfill. My duties were to prepare checks and to type invoices. After Mr. Hofgesang died, Mr. Hardy was in charge of all the businesses Mr. Hofgesang had, including Lee's Lane Landfill. There was no doubt that Mr. Hardy was in charge. He hired Paul Lynch to help run the Landfill. Mr. Hardy also terminated Edna Evans' employment.

3. I reported to Mr. Hardy daily about bank deposits and balances and whether Mr. Lynch had picked up or dropped off invoices. I also reported about problems with past due accounts. I was not authorized to do anything with out his okay.



I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 7, 1994.

  
\_\_\_\_\_  
Helen Rogers